

**FILED**

March 30, 2021

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

BY: lad  
DEPUTY

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

WILLIAM GRECIA, )  
                        )  
                        )  
Plaintiff,           )  
                        )  
vs.                   ) Case No.     **6:21-cv-00309**  
                        )  
                        )  
                        )  
PAYPAL, INC.,       )  
                        )  
                        )  
Defendant.           )

**COMPLAINT FOR PATENT INFRINGEMENT**

William Grecia brings this patent-infringement action against PayPal, Inc. (“PayPal”).

**Parties**

1. Plaintiff William Grecia is an individual residing in Downingtown, Pennsylvania.

2. PayPal is a Delaware corporation, having its principal place of business in San Jose, California and a regular and established place of business at Building D, 7700 W Parmer Ln, Austin, TX 78729.

**Jurisdiction and Venue**

3. This lawsuit is a civil action for patent infringement arising under the patent laws of the United States, 35 U.S.C. § 101 et seq. The Court has subject-matter jurisdiction pursuant to 28 U.S.C. §§ 1331, 1332, 1338(a), and 1367.

4. The Court has personal jurisdiction over Defendant for the following reasons: (1) Defendant is present within or has minimum contacts within the State of Texas and Western District of Texas; (2) Defendant has purposefully availed itself of the privileges of conducting business in the State of Texas and in this district; (3) Defendant has sought protection and benefit from the laws of the State of Texas; (4) Defendant regularly conducts business within the State of Texas and within this district, and Plaintiff's cause of action arises directly from Defendant's business contacts and other activities in the State of Texas and in this district; and (5) Defendant has a regular and established place of business in the State of Texas and in this district (Building D, 7700 W Parmer Ln, Austin, TX 78729).

5. Defendant, directly and/or through intermediaries, ships, distributes, uses, offers for sale, sells, and/or advertises products and services in the United States, the State of Texas, and the Western District of Texas including but not limited to the products which contain the infringing '555 patent systems and methods as detailed below. Upon information and belief, Defendant has committed patent infringement in the State of Texas and in this district; Defendant solicits and has solicited customers in the State of Texas and in this district; and Defendant has paying customers who are residents of the State of Texas and this district and who each use and have used the Defendant's products and services in the State of Texas and in this district.

6. Venue is proper in the Western District of Texas pursuant to 28 U.S.C. §§ 1400(b). Defendant has a regular and established place of business in this district, Defendant has transacted business in this district, and Defendant has directly and/or indirectly committed acts of patent infringement in this district.

**Infringement of U.S. Patent No. 8,402,555 Claim 16**

7. William Grecia is the exclusive owner of United States Patent No. 8,402,555 (the “‘555 patent”). See Exhibit A.

8. The ‘555 patent is valid and enforceable.

9. Defendant makes, uses, offers for sale and sells in the U.S. products, systems, and/or services that infringe the Patent-in-Suit, including, but not limited to its the PayPal computer program product showed in a claim chart (the “Accused Products” or “Accused Instrumentality”).

10. Attached hereto as “Exhibit B” and incorporated into this complaint as if alleged herein is a claim chart setting forth the language of claim 16 and the Accused Products that PayPal uses.

11. Claim 15 of the ‘555 patent is a computer product: “A computer program product for use with a computer, the computer program product comprising a non-transitory computer usable medium having a computer readable program code stored therein for monitoring access to an encrypted digital media, the method facilitating interoperability between a plurality of data processing devices, the computer program product performing the steps of . . .” (‘555 patent, col. 16:46-52.)

12. PayPal offers its customers—individuals and businesses holding accounts with PayPal —a way to make and receive payments digitally. The Accused Products includes code that facilitates monitoring access to the PayPal account holder’s money.

13. The claim 16 product has the capability of “receiving an encrypted digital media access branding request from at least one communications console of the plurality of data processing devices, the branding request being a read or write request of metadata

of the encrypted digital media, the request comprising a membership verification token provided by a first user, corresponding to the encrypted digital media . . . ." ('555 patent, col. 16:53-59.)

14. The PayPal computer program product is capable of associating a PayPal account identifier with a PayPal QR identifier.

15. Claim 16's product has the capacity for "authenticating the membership verification token, the authentication being performed in connection with a token database . . . ." ('555 patent, col. 16:60-62.) The PayPal computer program product is capable of receiving an access request by receiving a membership verification token (email or mobile number) through the PayPal communications console (Mobile App).

16. Claim 16: "establishing a connection with the at least one communications console wherein the communications console is a combination of a graphic user interface (GUI) and an Application Programmable Interface (API) protocol wherein the API is related to a verified web service, the verified web service capable of facilitating a two way data exchange to complete a verification process . . . ." ('555 patent, cols. 16:63-17:2.)

17. The PayPal computer program product is capable of establishing an API communication related to the PayPa QR RESTful API.

18. Claim 16 is a product with the capacity of "requesting at least one electronic identification reference from the at least one communications console wherein the electronic identification reference comprises a verified web service account identifier of the first user; receiving the at least one electronic identification reference from the at least one communications console . . . ." ('555 patent, col. 17:3-8.)

19. The PayPal computer program product is capable of requesting and receiving a QR code identifier from the PayPal QR API web service.

20. Claim 16's product includes the capacity for "branding metadata of the encrypted digital media by writing the membership verification token and the electronic identification reference into the metadata."

21. The PayPal computer program product is capable of writing the association of the membership verification token (email or mobile number) and the PayPal QR Identifier to the PayPal Computer Product metadata.

22. Claim 16, "wherein the membership verification token comprises at least one token selected from a group consisting of a purchase permission, a rental permission, or membership permission coupled to a royalty scheme; wherein the permission is represented by one or more of a letter, number, combination of letters and numbers, phrase, authorization, list, interface button or an instrument of trade for access rights of the encrypted digital media." ('555 patent, col. 17:12-22.)

23. The PayPal computer program product is capable of associating a PayPal account identifier with a PayPal QR identifier. The PayPal computer program product is capable of a per transaction based pricing model (royalty scheme). The PayPal "purchase" permission is represented by a QR code e.g., "letter and numbers and Instrument of Trade".

#### **Prayer for Relief**

WHEREFORE, William Grecia prays for the following relief against PayPal:

- (a) Judgment that PayPal has directly infringed claim 16 of the '555 patent;
- (b) For a reasonable royalty;

- (c) For pre-judgment interest and post-judgment interest at the maximum rate allowed by law;
- (d) For injunctive relief, including a preliminary injunction; and
- (e) For such other and further relief as the Court may deem just and proper.

**Demand for Jury Trial**

William Grecia demands a trial by jury on all matters and issues triable by jury.

Date: March 29, 2021

/s/ William Grecia

Pro Se

Case: WILLIAM GRECIA v. PAYPAL, INC.

Pro Se Contact Sheet:

William Grecia

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**RECEIVED**

March 30, 2021

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WESTERN DISTRICT OF TEXAS

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UNITED STATES US

SHIP DATE: 29MAR21  
ACTWT: 0.65 LB  
CAD: 6997916/SSF02121

BILL CREDIT CARD

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U.S DISTRICTS CLERKS OFFICE  
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